

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-cv-1776 (JRT/HB)

This Document Relates to:

ALL ACTIONS

PLAINTIFFS' MOTION TO COMPEL CUSTODIANS AND DOCUMENTS

Plaintiffs respectfully move this Court to compel all Defendants to comply with the ESI Protocol¹ (ECF No. 292) and redact and/or withhold from responsive work calendars only the information the ESI Protocol specifically authorizes at Section II(K). Plaintiffs further move to compel Defendants Tyson Foods, Inc., Tyson Prepared Foods, Inc., and Tyson Fresh Meats, Inc. to designate Don Tyson and John H. Tyson as Document Custodians in accordance with the ESI Protocol. Plaintiffs further move to compel Defendants JBS USA Food Company and JBS USA Food Company Holdings to designate Wesley Batista, Joesley Batista, Don Jackson, and Andrew Nogueira as Document Custodians in accordance with the ESI Protocol.

¹ “ESI Protocol” refers to Order Regarding Production of Electronically Stored Information and Paper Documents, Feb. 20, 2019, ECF No. 292

Plaintiffs set forth the bases for this Motion in the accompanying Memorandum of Law, the Declaration of Arielle S. Wagner in support thereof, and the exhibits attached thereto.

Date: December 7, 2020

Respectfully submitted,

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